

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Zdenek Bakala,

Plaintiff,

-against-

Pavol Krupa, Adam Swart, and
Crowds on Demand LLC,

Defendants.

Case No. 9:18-cv-02590-DCN

**PLAINTIFF'S ANSWERS
TO LOCAL RULE 26.01
INTERROGATORIES**

Plaintiff Zdenek Bakala hereby responds to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: There is no such person or entity.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Each claim should be tried by a jury, because each is a claim at law for which a jury trial is available as a matter of right.

C. State whether the party submitting these responses is a publicly-owned company and separately identify, (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Not applicable.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01 (D.S.C.).

RESPONSE: This action has been filed in the Charleston Division pursuant to 18 U.S.C. § 1965 (a) and (b), as well as 28 U.S.C. §§ 1391(b) and (c) because a substantial part of the events giving rise to this action occurred in this division,

where Plaintiff is a resident, and because the Defendants committed tortious acts in this division.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Not applicable.

Respectfully submitted,

s/ Marshall Winn

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Of Counsel:

*(Applications for Admission Pro Hac Vice to be filed
with the Court)*

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Dated: September 21, 2018 *Attorneys for Plaintiff Zdenek Bakala*